structure set and the various telephony environments with message structure sets specific to each telephony environment. Furthermore, the selection of the specific telephony environment is determined by the computer telephony application, and the configuration of the telephony server is automatically implemented upon receipt of a selection message from the telephony application. These distinguishing features are similarly defined in independent claim 6 as well, which is directed to a call processing system. The applicants do not believe that the present invention with the above distinguishing features is anticipated by Rogers as alleged by the Examiner.

Rogers teaches a Call Management System which comprises a call management computer 101 to intercept between the central office (CO) 103 and the PBX or other switch 104 (see Figure 1). A user workstation computer 114 is connected to the call management computer 101 via a data network 100 for a user 106 to control and monitor the calls between the CO 103 and the telephone terminal (such as the telephone instrument 106), thus adding extra useful features without changing or upgrading PBX switch or telephone terminal instruments.

However, nowhere in the Rogers reference is the present invention taught or implied. In Rogers, the call management computer 101 (which corresponds to the telephony server in the present invention) implements real-time protocol conversion between the CO 103 and the PBX 104 through relevant interfaces 203-206 (see Figure 2). This is a protocol conversion between different telephony environments (CO 103 may include internet. See col. 7, lines 39-43), but not a protocol conversion between the workstation computer 114 (which may correspond to a telephony application of the present invention as to the extent of its function in monitoring and controlling the calls) and the various telephony environments (CO 103 and PBX 104). Rogers does not address the question of difference in protocol between the workstation computer 114 and the various telephony environments.

computer 101 depending upon the destination (col. 10, lines 48-56). The workstation computer 114 (telephony application) does not have means to select the telephony environment, and thus the call management computer 101 (telephony server) is not configured upon receipt of the selection message from the workstation computer 114 (telephony application).

Therefore, the applicants believe the present invention as defined in the independent claims 1, 6 and 8 is not anticipated by Rogers under 35 U.S.C. §102(e) and thus patentable. At least for the same reasons, their respective dependent claims 3-5, 7 and 9-10 are also patentable. Reconsideration is here respectfully requested in view of the above remarks.

Respectfully submitted,

KAPLAN & GILMAN, L.L.P.

900 Route 9 North

Woodbridge, New Mersey 07095

Telephone (732

DATED: May 15, 2002

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal service as first class mail, in a postage prepaid envelope, addressed to Box Non-Fee Amendment, Commissioner for Patents, Washington, D.C. 20231 on May 15, 2002.

Dated

Print Name

Paula M. Halsey